

headquarters, the controls primarily consisted of security guard services and employee background checks. Both were provided by outside agencies. Burns International Services Corporation (known today as Securitas Security Services USA, Inc.) had been hired to provide security guard services. Guards were present at night, but minimal security existed during business hours. A temporary agency had been hired to perform a pre-employment background check on all employees. It consisted of little more than a basic civil background check.³

Security was weaker at the company's mail processing facilities. Employee background checks were superficial, if they were performed at all. Seventy percent of the facilities' workers were temporary employees whose backgrounds were not checked before they were hired. A contract-level guard service provided uniform visibility, but little else. Most of the facilities were located in industrial areas where urban crime problems were commonplace. These facilities often had poor outdoor lighting, inadequate fencing, and no security cameras. Employees were at risk of attack as they walked across the parking lots, the facilities were not protected from the risk of car bombs, and there was little control over who was in a facility at any given time. Emergency exit doors were frequently propped open. Visitors were not monitored, and contractors were allowed to freely wander around the facilities.³

Neither corporate headquarters nor any of the facilities had mailrooms to handle incoming mail. Packages and other types of mail were left inside the building, near the front entrance.³ There were other security vulnerabilities common to all locations. Sensitive documents were discarded in their entirety. Keys to interior offices and exterior doors were not carefully controlled or managed. Plans for business continuity and disaster recovery were inconclusive and undocumented.³

Although physical security was weak, considerably stronger controls were in place to protect Advo's critical applications and databases. In July 1996, Advo entered into a ten-year agreement with IBM Global Services⁴ to provide computer processing, systems development and systems legacy

support to Advo. Advo's proprietary databases and enterprise applications were stored and processed on more than two dozen servers in IBM's Southbury, Connecticut, facility. Included were data pertaining to Advo's order processing and production control systems, transportation and distribution systems, billing and financial systems, human resources and payroll processing systems, address list maintenance files, label printing and distribution systems, carrier routing of addresses from client files, and market and demographic analyses.¹ Long-term agreements were signed with IBM to provide server farm management services and to provide security services for Advo's applications and data. IBM's security services included provisions for real-time system monitoring, intrusion detection and prevention, and incident management.

Terrorist and Bioterrorist-Related Attacks

Many of Advo's executive officers were in New York City on the morning of September 11, 2001.³ The CEO and several senior-level managers from the company's Operating Committee were in Manhattan when American Airlines Flight 11 and United Airlines Flight 175 hit the North and South Towers of the World Trade Center.

The terrorist attacks elevated the importance of security within Advo. There was an abrupt and dramatic change in executive attitudes and physical security was given top priority. Advo's CEO, in consultation with the Senior Vice President of Fulfillment, mandated that a real security presence be established at all locations. The Wackenhut Corporation was immediately hired to provide uniformed security officers on a 24-7 basis at Advo's corporate headquarters and at all mail processing facilities.³

The crisis was far from over. Less than two weeks after the 9/11 attacks, the first bioterrorism-related anthrax attack occurred.⁵ Public fears grew as media reports of anthrax-laced mail increased. By the end of the first week of October, the first anthrax-related death had been reported. The origin of the anthrax was tied to a letter that the victim had handled. By